

# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
Intertek USA Inc.

AUTHORIZING THE OPERATION OF  
Intertek Automotive Research  
Testing Laboratories

LOCATED AT  
Bexar County, Texas  
Latitude 29° 28' 44" Longitude 98° 35' 34"  
Regulated Entity Number: RN102459393

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: 02667 Issuance Date: \_\_\_\_\_

\_\_\_\_\_  
For the Commission

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## **General Terms and Conditions**

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five-year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

## **Special Terms and Conditions:**

### **Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting**

1. Permit holder shall comply with the following requirements:
  - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
  - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
  - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
  - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):

- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
  - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
  - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as

required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.
- B. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
  - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
  - (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
  - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- 4. For storage vessels maintaining working pressure as specified in 30 TAC Chapter 115, Subchapter B, Division 1: "Storage of Volatile Organic Compounds," the permit holder shall comply with the requirements of 30 TAC § 115.112(c)(1).

#### **Additional Monitoring Requirements**

- 5. The permit holder shall comply with the periodic monitoring requirements as specified in the attached "Periodic Monitoring Summary" upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "Periodic Monitoring Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

#### **New Source Review Authorization Requirements**

- 6. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the permits by rule identified in the PBR Supplemental Tables in the application), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit

- C. Are not eligible for a permit shield
- 7. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- 8. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

### **Compliance Requirements**

- 9. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
- 10. Use of Discrete Emission Credits to comply with the applicable requirements:
  - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) If applicable, offsets for Title 30 TAC Chapter 116
    - (iv) Temporarily exceed state NSR permit allowables
  - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
    - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
    - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
    - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122

- (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

**Permit Location**

11. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.



## **Attachments**

**Applicable Requirements Summary**

**Additional Monitoring Requirements**

**New Source Review Authorization References**

### **Applicable Requirements Summary**

<b>Unit Summary .....</b>	<b>9</b>
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<b>Applicable Requirements Summary .....</b>	<b>10</b>
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Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRP-TNKSUBFILL	STORAGE TANKS/VESSELS	UST-01A, UST-01B, UST-02, UST-03, UST-04, UST-05, UST-06, UST-07, UST-08, UST-09	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-TNKSUBFIL L	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.112(c)(1)	Tanks shall not store VOC, other than crude oil or condensate, unless the required pressure is maintained, or they are equipped with the appropriate control device specified in Table I(b).	** See Periodic Monitoring Summary	None	None

### **Additional Monitoring Requirements**

<b>Periodic Monitoring Summary .....</b>	<b>12</b>
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### Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-TNKSUBFILL	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Record of Tank Construction Specifications	
Minimum Frequency: N/A	
Averaging Period: N/A	
Deviation Limit: Tank design drawings will be kept on file and available for inspection.	
<p>Periodic Monitoring Text: Keep a record of tank construction specifications (e.g. engineering drawings) that show a fill pipe that extends from the top of a tank to have a maximum clearance of six inches (15.2 centimeters) from the bottom or, when the tank is loaded from the side, a discharge opening entirely submerged when the pipe used to withdraw liquid from the tank can no longer withdraw liquid in normal operation.</p>	

### Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: GRP-TNKSUBFILL	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: R5112
Pollutant: VOC	Main Standard: § 115.112(c)(1)
Monitoring Information	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: N/A	
Deviation Limit: The fill pipe will be inspected each time the storage tank is emptied and degassed.	
<p>Periodic Monitoring Text: Inspect to determine the structural integrity of the fill pipe and record each time the storage vessel is emptied and degassed to ensure that it continues to meet the specifications in the above requirement. If the structural integrity of the fill pipe is in question, repairs shall be made before the storage vessel is refilled. It shall be considered and reported as a deviation if the repairs are not completed prior to refilling the storage vessel.</p>	

**New Source Review Authorization References**

<b>New Source Review Authorization References .....</b>	<b>15</b>
<b>New Source Review Authorization References by Emission Unit .....</b>	<b>16</b>



### New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

<b>Prevention of Significant Deterioration (PSD) Permits</b>	
PSD Permit No.: PSDTX1021	Issuance Date: 04/12/2016
<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 47554	Issuance Date: 04/12/2016
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.227	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.412	Version No./Date: 09/04/2000
Number: 106.425	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.512	Version No./Date: 06/13/2001

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
UST-01A	UNDER GRND STOR TANK 1A	47554, PSDTX1021
UST-01B	UNDER GRND STOR TANK 1B	47554, PSDTX1021
UST-02	UNDER GRND STOR TANK 2	47554, PSDTX1021
UST-03	UNDER GRND STOR TANK 3	47554, PSDTX1021
UST-04	UNDER GRND STOR TANK 4	47554, PSDTX1021
UST-05	UNDER GRND STOR TANK 5	47554, PSDTX1021
UST-06	UNDER GRND STOR TANK 6	47554, PSDTX1021
UST-07	UNDER GRND STOR TANK 7	47554, PSDTX1021
UST-08	UNDER GRND STOR TANK 08	47554, PSDTX1021
UST-09	UNDER GRND STOR TANK 09	47554, PSDTX1021

\*\*This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

**Appendix A**

**Acronym List ..... 18**

## Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H <sub>2</sub> S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
SIP	state implementation plan
SO <sub>2</sub>	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

**Appendix B**

**Major NSR Summary Table ..... 20**

**Major NSR Summary Table**

Permit Number: 47554 and PSDTX1021			Issuance Date: April 12, 2016				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Spec. Cond.	Spec. Cond.	Spec. Cond.
1	Gasoline and Natural Gas Engine Testing	NO <sub>x</sub>	3.3	14.3	2	2, 4, 6	6
		CO	124.0	543.0			
		VOC	4.7	20.5			
		SO <sub>2</sub>	0.14	0.62			
		PM	0.14	0.62			
		PM <sub>10</sub>	0.14	0.62			
		PM <sub>2.5</sub>	0.14	0.62			
2	Diesel Engine Testing Cat Stands	NO <sub>x</sub>	0.73	3.2	2	2, 5, 6	6
		CO	0.16	0.7			
		VOC	0.05	0.2			
		SO <sub>2</sub>	0.05	0.2			
		PM	0.02	0.1			
		PM <sub>10</sub>	0.02	0.1			
		PM <sub>2.5</sub>	0.02	0.1			
3	Diesel Engine Testing MCD Stands	NO <sub>x</sub>	22.8	99.9	2	2, 5, 6	6
		CO	5.1	22.3			
		VOC	1.65	7.0			
		SO <sub>2</sub>	1.65	7.0			
		PM	0.82	3.6			
		PM <sub>10</sub>	0.82	3.6			
		PM <sub>2.5</sub>	0.82	3.6			
4	Turbine Testing	NO <sub>x</sub>	1.2	5.3	2	2, 6	
		CO	3.8	16.4			
		VOC	0.1	0.3			

### Major NSR Summary Table

Permit Number: 47554 and PSDTX1021			Issuance Date: April 12, 2016				
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY (4)	Spec. Cond.	Spec. Cond.	Spec. Cond.
		SO <sub>2</sub>	<0.1	0.1			
		PM	<0.1	0.1			
		PM <sub>10</sub>	<0.1	0.1			
		PM <sub>2.5</sub>	<0.1	0.1			
5	VOC Storage Tanks Group Gasoline and Diesel	VOC	18.1	79.3		6	

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- NO<sub>x</sub> - total oxides of nitrogen
- SO<sub>2</sub> - sulfur dioxide
- PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented
- PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented
- PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter
- CO - carbon monoxide
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) The allowable emission rates include emissions from planned maintenance, startup, and shutdown activities.



## Texas Commission on Environmental Quality Air Quality Permit

*A Permit Is Hereby Issued To*

**Intertek USA Inc.**

*Authorizing the Construction and Operation of*

**Intertek Automotive Research**

*Located at San Antonio, Bexar County, Texas*

*Latitude 29° 28' 45" Longitude -98° 35' 34"*

Permit: 47554

Revision Date: April 12, 2016

Expiration Date: October 8, 2023

A handwritten signature in black ink, appearing to read "R. D. A. Hyle".

For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code (TAC) Section 116.116 (30 TAC § 116.116)]<sup>1</sup>
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling



facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]

6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction in a timely manner; comply with any additional recordkeeping requirements specified in special conditions in the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled “Emission Sources--Maximum Allowable Emission Rates.” [30 TAC § 116.115(b)(2)(F)]<sup>1</sup>
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification in accordance with 30 TAC §101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC§ 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to “air pollution” as defined in Texas Health and Safety Code (THSC) §382.003(3) or violate THSC § 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.<sup>1</sup>

<sup>1</sup> Please be advised that the requirements of this provision of the general conditions may not be applicable to greenhouse gas emissions.

## Special Conditions

Permit Numbers 47554 and PSDTX1021

### Emission Limits and Operating Conditions

1. A copy of this permit shall be kept at the plant site and made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any air pollution control agency having jurisdiction. In addition, the holder of this permit shall identify all emission source equipment by the emission point numbering on the maximum allowable emission rates table (MAERT).

This permit does not include the facilities or planned maintenance, startup, or shutdown (MSS) activities at the site listed in Attachment I, except as noted in the MAERT. Instead, these facilities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106) or are authorized as a de minimis source by 30 TAC § 116.119. The lists in Attachment I are not intended to be all-inclusive and can be altered at the site without modifications to this permit. **(4/14)**

2. The opacity shall not exceed 20 percent averaged over a six-minute period from Emission Point Numbers (EPNs) 1, 2, 3, and 4. Observations of visible emissions shall be performed and recorded quarterly. Observations shall be made at least 15 feet and no more than 0.25 miles from the emission point(s). If visible emissions are observed from an emission point, then the opacity shall be determined and documented within 24 hours for that emission point using Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Contributions from uncombined water shall not be included in determining compliance with this condition. If the opacity exceeds 20 percent (or other opacity if applicable), corrective action to eliminate the source of visible emissions shall be taken promptly and documented within one week of first observation. **(4/14)**.
3. Emissions authorized under this permit are limited to the following areas:  
  
Gasoline and Natural Gas Engine Testing. (EPN 1) **(3/13)**;  
  
Diesel Engine Testing (EPN 2 and EPN 3);  
  
Turbine Testing (EPN 4); and  
  
Volatile Organic Compounds (VOC) Storage Tanks Group (EPN 5).

### Control Requirements

4. The combined operation of the Gasoline and Natural Gas Engine Test Stands (EPN 1) is limited to 33,522,537 horsepower (hp)-hours per year. **(3/13)**
5. The combined operation of the Diesel Engine Cat Test Stands (EPN 2) is limited to 2,041,516 hp-hours per year. The combined operation of the Diesel Engine MCD Stands (EPN 3) is limited to 63,140,453 hp-hours per year. **(08/15)**

## **Recordkeeping**

6. The following records shall be maintained at the plant site on a five year rolling basis (unless noted otherwise) rather than the two-year period specified in General Condition No. 7 and shall be made immediately available at the request of personnel from the TCEQ or any pollution control agency with jurisdiction.
  - A. Engines
    - (1) The number of engine test stands located in each building at the site. This record shall be kept for the life of the permit.
    - (2) The total hp-hours of usage for all engine test stands located in each building at the site, compiled monthly and annually, and reported per building.
  - B. Material Safety Data Sheets for all solvents, fluids, fuels, lubricants, or other similar substances used or located at the site; and data of monthly use for all coating materials, solvents, fluids, lubricants, or other similar substances used or located at the site and reasonably expected to produce emissions.
  - C. Records shall be kept on tank loading including the date and time of loading along with the type and amount of fluid loaded. Records of tank unloading for disposal of waste fluids shall be kept including the date and time of unloading and the type and amount of fluid unloaded.
  - D. The permit holder shall also create a record of all emission sources (engines, tanks, etc.) located within each building and outdoors on the grounds of the site that are authorized under this permit. For this record and associated calculations, the list of buildings or outdoor locations, if applicable, and their respective emission sources shall be grouped according to the EPNs listed in Special Condition No. 3 and used to demonstrate compliance with the hourly and annual emission limits in the MAERT. Activities and their associated emissions may be moved within an EPN on the MAERT, but shall not be allowed to transfer from one EPN to another. These records shall be kept for the life of the permit.
  - E. Calculations of emissions, compiled monthly and annually, shall comply with the following:
    - (1) The basis for emissions calculations including (but not limited to):
      - (a) Type of activity performed (engine testing, tank loading / unloading, etc.),
      - (b) Emission factors used for each activity,
      - (c) Hours of operation for each activity reasonably expected to produce emissions, and
      - (d) Any assumptions made to estimate emissions.
    - (2) The methods of calculating emissions shall be consistent from month to month and follow the representations made in the permit application and subsequent

submittals to the TCEQ. The calculations performed above shall be used to show compliance with the MAERT for each EPN.

**Pollution Prevention**

7. Spills or leaks of VOC containing fluids shall be minimized to the best extent practical.
8. All facilities at this site shall implement good housekeeping procedures to minimize fugitive emissions, including the following.
9. All spills shall be cleaned up immediately.
10. All new and used coatings, solvents, lubricants, and similar fluids shall be stored in closed containers. All waste coatings, solvents, lubricants, and similar fluids shall be removed from the site by an authorized disposal service or disposed of at a permitted on site waste management facility.

Date: August 17, 2015

## Attachment I

Permit Number 47554 and PSDTX1021

### Planned MSS Activities and Other Authorizations

Source or Activity – PBR	Authorization
Natural gas-fired comfort heating	§ 106.102
Soldering, brazing, welding equipment	§ 106.227
Cleaning and stripping solvents greater than 50 gallons per year, site-wide	§ 106.261 and/or § 106.262
Water-based surfactants/detergents, greater than 2,500 gallons per year site-wide	§ 106.261 and/or § 106.262
Usage of organic solvents for maintaining equipment	§ 106.261 and/or § 106.262
Routine maintenance activities for carbon adsorption (e.g., carbon replacement) which are planned and predictable and ensure the continuous normal operation of the facility or control device or return a facility or control device to normal operating conditions.	§ 106.263(c)(1)
Maintenance of engines and turbines authorized by a permit	§ 106.263(c)(1)
Routine maintenance activities which are planned and predictable and ensure the continuous normal operation of a facility or control device or return a facility or control device to normal operating conditions.	§ 106.263(c)(1)
Startup and shutdown of engines and turbines authorized by a permit	§ 106.263(c)(2)
Routine facility maintenance including painting and abrasive blasting on immovable structures	§ 106.263(c)(3)(A)
Routine maintenance, startup, and shutdown of facilities and temporary maintenance facilities	§ 106.263(c)(3)
Abrasive blasting, painting, and surface preparation of storage tanks	§ 106.263(c)(3)
Manually operated and hand-held equipment	§ 106.265
Equipment fueling	§ 106.412
Enclosed abrasive blasting cleaning operations	§ 106.452(1)
Remote reservoir and cold solvent cleaners for maintenance	§ 106.454
Parts cleaning equipment with cold solvent/remote reservoir, conveyORIZED, and open-top cleaners	§ 106.454
Maintenance, startup, and shutdown of degreasers/solvent cleaning machines authorized by a PBR	§ 106.454

<b>Source or Activity – PBR</b>	<b>Authorization</b>
Diesel fuel storage tanks, gasoline storage tanks, lube oil storage tanks, and loading and unloading.	§ 106.472 and/or § 106.473
Emergency diesel fire water pumps, electric generators, and portable engines.	§ 106.511
Maintenance, startup, and shutdown of portable and emergency engines and turbines authorized by a PBR.	§ 106.511
Maintenance, startup, and shutdown of stationary engines and turbines authorized by a PBR.	§ 106.512

<b>Source or Activity – De Minimis</b>	<b>Authorization</b>
Equipment used exclusively for steam cleaning of fabrics, plastics, rubber, wood, or vehicle engines or drive trains	§ 116.119(a)(1)
Application of aqueous detergents, surfactants, and other cleaning solutions containing less than 1% of any organic compound by weight	116.119(a)(1)
Application of aqueous detergents, surfactants, and other cleaning solutions containing not more than one percent of any organic compound by weight or containing not more than five percent of any organic compound with a vapor pressure less than 0.002 pounds per square inch absolute.	§ 116.119(a)(1)
Manual application of cleaning or stripping solutions or coatings for maintenance.	§ 116.119(a)(1)
Glove box/self-contained abrasive blasting and associated filter replacement.	§ 116.119(a)(1)
Blast cleaning operations with water as the cleaning media.	§ 116.119(a)(1)
Usage of organic chemicals including lubricants, greases, and oils without propellants other than air or nitrogen for maintaining equipment.	§ 116.119(a)(1)
Application of lubricants for maintaining equipment.	§ 116.119(a)(1)
Office equipment maintenance and cleaning (printers, copiers, etc.)	§ 116.119(a)(1)
Maintenance and cleaning of in-situ computer and office equipment	§ 116.119(a)(1)
Janitorial and maid services	§ 116.119(a)(1)
Grounds maintenance and landscaping	§ 116.119(a)(1)
Maintenance of heating and cooling equipment for personal use	§ 116.119(a)(1)
Comfort air conditioning or comfort ventilation systems	§ 116.119(a)(1)

<b>Source or Activity – De Minimis</b>	<b>Authorization</b>
which are not used to remove air contaminants generated by or released from specific units or equipment	
Maintenance of equipment by hydraulic or hydrostatic testing	§ 116.119(a)(1)
Application of argon, ethane, helium, hydrogen, methane, neon, nitrogen, and propane for testing, purging, and leak checking of equipment.	§ 116.119(a)(1)
Aerosol product use – less than 4 cans (64 oz) per day – 12 month rolling average.	§ 116.119(a)(1)
Aerosol can puncturing, recycling, and disposal – less than 40 cans per 24-hour period.	§ 116.119(a)(1)
Pesticide and insecticide use and fumigation.	§ 116.119(a)(1)

Date: April 24, 2014

# Emission Sources - Maximum Allowable Emission Rates

Permit Numbers 47554 and PSDTX1021

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

## Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
1	Gasoline and Natural Gas Engine Testing	NO <sub>x</sub>	3.3	14.3
		CO	124.0	543.0
		VOC	4.7	20.5
		SO <sub>2</sub>	0.14	0.62
		PM	0.14	0.62
		PM <sub>10</sub>	0.14	0.62
		PM <sub>2.5</sub>	0.14	0.62
2	Diesel Engine Testing Cat Stands	NO <sub>x</sub>	0.73	3.2
		CO	0.16	0.7
		VOC	0.05	0.2
		SO <sub>2</sub>	0.05	0.2
		PM	0.02	0.1
		PM <sub>10</sub>	0.02	0.1
		PM <sub>2.5</sub>	0.02	0.1
3	Diesel Engine Testing MCD Stands	NO <sub>x</sub>	22.8	99.9
		CO	5.1	22.3
		VOC	1.65	7.0
		SO <sub>2</sub>	1.65	7.0
		PM	0.82	3.6
		PM <sub>10</sub>	0.82	3.6
		PM <sub>2.5</sub>	0.82	3.6



Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
4	Turbine Testing	NO <sub>x</sub>	1.2	5.3
		CO	3.8	16.4
		VOC	0.1	0.3
		SO <sub>2</sub>	<0.1	0.1
		PM	<0.1	0.1
		PM <sub>10</sub>	<0.1	0.1
		PM <sub>2.5</sub>	<0.1	0.1
5	VOC Storage Tanks Group Gasoline and Diesel	VOC	18.1	79.3

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.

(2) Specific point source name. For fugitive sources, use area name or fugitive source name.

(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1

NO<sub>x</sub> - total oxides of nitrogen

SO<sub>2</sub> - sulfur dioxide

PM - total particulate matter, suspended in the atmosphere, including PM<sub>10</sub> and PM<sub>2.5</sub>, as represented

PM<sub>10</sub> - total particulate matter equal to or less than 10 microns in diameter, including PM<sub>2.5</sub>, as represented

PM<sub>2.5</sub> - particulate matter equal to or less than 2.5 microns in diameter

CO - carbon monoxide

(4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.

(5) The allowable emission rates include emissions from planned maintenance, startup, and shutdown activities.

Date: April 12, 2016